



HOW TO DEVELOP CORRECTIVE ACTION PLANS

A corrective action plan (CAP) is a voluntary agreement established with the person-in-charge to attain active managerial control over foodborne illness risk factors that are out of control. A corrective action plan should be developed by the person-in-charge with guidance from the food safety inspection officer. HACCP principles should be used to develop a corrective action plan.

The first three HACCP principles are covered by the TFER:

- 1) Identify the hazard
- 2) Determine the critical control point
- 3) Determine the critical limit of the critical control point

A CAP covers the next four principles:

- 4) Monitoring—the CAP should provide answers to the following questions:
 - a) What will be done?
 - b) Who will do it?
 - c) Where will it be done?
 - d) When and how often will it be done?
- 5) Corrective Action—the CAP should provide answers to the following question:

What will the food establishment employees do when the food is out of time/temperature control?
- 6) Verification—the CAP should provide answers to the following questions:
 - a) How do you know if the plan is working?
 - b) Who is in charge of determining if the plan is working?
- 7) Record Keeping—the CAP should provide answers to the following questions:
 - a) Where are the records going to be kept?
 - b) How long are the records going to be kept?

COLD HOLD VIOLATIONS

Applicable Texas Food Establishment Rules (TFER) Sections:

Section 228.75(f) Temperature and time control, hot and cold holding.

Section 228.2 (144) Time/temperature Control for Safety food, definition.

Time/temperature control for safety food definition

Time/temperature Control for Safety (TCS) food (TCS)--(formerly Potentially Hazardous Food (PHF)) A food that requires time/temperature control for safety to limit pathogenic microorganism growth or toxin formation. An animal food that is raw or heat-treated. A plant food that is heat-treated or consists of raw seed sprouts, cut melons, cut leafy greens, cut tomatoes or mixture of cut tomatoes that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation, or garlic-in-oil mixtures that are not modified in a way so that they are unable to support pathogenic microorganism growth or toxin formation.

Example of a Cold Hold CAP

"The owner agrees to place an accurate thermometer in the walk-in cooler by close of business today. Each shift manager will record the temperature of the walk-in at 10 am, 2 pm, and closing. If the air temperature is higher than 41°F, internal temperatures of time/temperature control for safety (TCS) food will be checked. If the TCS food internal temperatures are higher than 41°F for more than 4 hours, the owner will be notified, food will be destroyed and action recorded in the temperature log book. The manager will calibrate the walk-in cooler weekly and record the results in the temperature log book that will be kept in the manager's office."

Elements of the CAP

Principle #4: Monitoring

"Each shift manager will record the temperature of the walk-in at 10 am, 2 pm, and closing"

What will be done?	Temperature will be recorded
Who will do it?	Each shift manager
Where will it be done?	In the walk-in
When will it be done?	10am, 2pm, and closing

Principle #5: Corrective Action

What will be done when the food is out of time/temperature control?

"The owner will be notified, food will be destroyed, and action recorded in the temperature log book"

Principle #6: Verification

"The manager will calibrate the walk-in cooler weekly and record the results"

Who is in charge of determining if the plan is working? The manager

How does he know if the plan is working? Checks the thermometer and Log book

Principle #7: Record Keeping

"The manager will calibrate the walk-in cooler weekly and record the results in the temperature log book that will be kept in the manager's office."

Where are the records going to be kept? In the manager's office

How long are the records going to be kept? Indefinitely